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*Attorneys for Defendants
C. R. Bard, Inc. and
Bard Peripheral Vascular, Inc.*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

IN RE: Bard IVC Filters Products Liability
Litigation,

No. 2:15-MD-02641-DGC

**DEFENDANTS' NOTICE OF
LODGING UNDER SEAL CERTAIN
EXHIBITS IN SUPPORT OF
DEFENDANTS' RESPONSE IN
OPPOSITION TO PLAINTIFF'S
MOTION *IN LIMINE* NO. 2**

(Assigned to the Honorable David G.
Campbell)

Defendants C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. (collectively
"Bard"), pursuant to the Stipulated Protective Order (Doc. 269) and Local Civil Rule 5.6,
file this Notice of Lodging Under Seal certain exhibits attached in support of Defendants'
Response in Opposition to Plaintiff's Motion *In Limine* No. 2. These exhibits contain
Plaintiff's personal healthcare information that is protected under HIPAA and confidential
under the Stipulated Protective Order. Defendants have notified Plaintiff of their intent to

1 file this Notice of Lodging. Because the documents lodged under seal and materials
 2 lodged redacted only relate to Plaintiff's personal healthcare information, Defendants note
 3 that it is Plaintiff's burden to file a motion to seal. A list of the exhibits lodged under seal,
 4 and a list of materials lodged redacted, are attached hereto as Exhibit A.

5 RESPECTFULLY SUBMITTED this 25th day of April, 2018.

6 s/ Richard B. North, Jr.
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 23 **Bard Peripheral Vascular, Inc.**

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CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of April, 2018, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all attorneys of record.

s/Richard B. North, Jr.
Richard B. North, Jr.

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EXHIBIT A

DOCUMENTS PROPOSED TO BE FILED UNDER SEAL

Defendants request they be permitted to file under seal the following documents in support of their Response in Opposition to Plaintiff's Motions *In Limine* No. 2:

1. Redacted Response to Plaintiff's Motion in Limine #2 to Exclude Evidence of Unrelated Medical Issues Relating to Anemia and Prescriptions
2. Exhibit D – Report of David A. Garcia, MD
3. Exhibit E – Exhibit 4027 to deposition of Dr. Anthony Avino
4. Exhibit F – Excerpts of deposition of Dr. Anthony Avino
5. Exhibit G – Excerpts of deposition of Dr. David Jason Chodos